

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

FOREMAN ELECTRIC, INC.

Plaintiff,

v.

PUERTO RICO ELECTRIC POWER AUTHORITY,
COBRA ACQUISITIONS LLC, CENTRAL OFFICE
FOR RECOVERY, RECONSTRUCTION AHSHA
TRIBBLE and KEITH ELLISON

Defendants.

PROMESA

Title III

No. 17-BK-4780-LTS

(Jointly Administered)

Adv. Proc. No.:

No. 24-00075-LTS

**JOINT STIPULATION AND AGREED ORDER OF
THE PUERTO RICO ELECTRIC POWER AUTHORITY, THE CENTRAL OFFICE
FOR RECOVERY, RECONSTRUCTION AND RESILIENCE, AND FOREMAN
ELECTRIC SERVICES, INC. REGARDING SCHEDULE FOR RESPONDING TO
ADVERSARY COMPLAINT**

WHEREAS, on September 19, 2024, Foreman Electric Services, Inc. (“Foreman”) filed a Complaint [ECF No. 1] against the Puerto Rico Electric Power Authority (“PREPA” or the “Debtor”), represented in this this matter by the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), in its capacity as sole Title III representative of the Debtor pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability*

Act (“PROMESA”),¹ Cobra Acquisitions, LLC (“Cobra”), the Central Office for Recovery, Reconstruction and Resilience (“COR3”), Ahsha Tribble (“Tribble”), and Keith Ellison (“Ellison”) (collectively, “Defendants”).

WHEREAS, this Court issued summons as to all Defendants on October 1, 2024. ECF No. 6.

WHEREAS, Foreman failed to serve the summons on PREPA or COR3 within the time prescribed by Federal Rule of Bankruptcy Procedure 7004(e).

WHEREAS, PREPA and COR3 have agreed to accept untimely service of the Complaint.

WHEREAS, PREPA, COR3, and Foreman have agreed to set the following schedule for responding to the Complaint.

IT IS HEREBY STIPULATED AND AGREED that:

1. The Oversight Board and COR3 shall answer, move to dismiss, or otherwise respond to the Complaint by **December 18, 2024**.

2. Foreman shall file a response to any motion or an amended pleading on or before **January 10, 2025**, and Foreman’s right to amend their pleading as a matter of course pursuant to Federal Rule of Bankruptcy Procedure 7015 and Federal Rule of Civil Procedure 15(a)(1)(B) is hereby extended to January 10, 2025.

3. If Foreman does not amend its pleading, as a matter of course, and instead files a response to the motion, the Oversight Board and COR3 shall file their reply in further support of the motion on or before **January 24, 2025**.

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: November 25, 2024
New York, NY

Respectfully submitted,

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SO ORDERED.

Dated: _____, 2024

Hon. Laura Taylor Swain
United States District Court Judge